

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
ARLINDA CANDELARIO	:	
	:	
Debtor	:	Case No. 16-18330(JKF)
	:	
	:	<b>Hearing Date: 7/27/17</b>
	:	<b>Time: 9:30 a.m.</b>
	:	<b>Courtroom #3</b>
	:	<b>900 Market Street</b>
	:	<b>Philadelphia, PA 19107</b>

**DEBTORS' RESPONSE IN OPPOSITION TO  
THE TRUSTEE'S MOTION TO DISMISS**

The Debtor, Arlinda Candelario, hereinafter referred to as the "Debtor," by and through her counsel, Center City Law Offices, LLC, hereby respectfully files her response to the Trustee's Motion to Dismiss. For the reasons more fully set forth below, the Debtor submits that there is no basis for dismissal.

1. The delay in this case is solely caused by the repeated requests for information from the Pennsylvania Housing Finance Agency ("PHFA") in their consideration for a loan modification for the Debtor. If PHFA approves the loan modification, the Debtor will have no need to stay in the bankruptcy. The Debtor is current on all her plan payments and is in the process of working out a payment plan with the City of Philadelphia on a pre-petition claim.

WHEREFORE, the Debtor, Arlinda Candelario respectfully prays this Honorable Court deny any and all relief requested presently by the Motion of the Trustee

Respectfully submitted,

*CENTER CITY LAW OFFICES, LLC*

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